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Attorneys for Plaintiff,
Mass Engineered Design, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

MASS ENGINEERED DESIGN, INC.,

Plaintiff,

v.

PLANAR SYSTEMS, INC.,

Defendant.

Case No.: 3:16-cv-01510-SI

**MASS'S AMENDED OBJECTIONS TO
PLANAR'S TRIAL EXHIBIT LIST**

[FILED UNDER SEAL]

Plaintiff, Mass Engineered Design, Inc. (collectively “Mass”), respectfully submits its Amended Objections to Defendant’s Trial Exhibit List, as follows:

Exhibit Number	Exhibit Description	Mass’s Objections
401	Exhibit 1 to January 1, 2017 Report of Dr. Raymond Yee (CV)	802 and cumulative of testimony needed to qualify the witness as expert
402	Exhibit 2 to January 1, 2017 Report of Dr. Raymond Yee (Materials considered)	802 and cumulative of expected testimony
403	Exhibit 3 to January 1, 2017 Report of Dr. Raymond Yee (978 patent)	None (but duplicative of JX1)
404	Exhibit 4 to January 1, 2017 Report of Dr. Raymond Yee (331 patent)	None (but duplicative of JX2)
405	Exhibit 5 to January 1, 2017 Report of Dr. Raymond Yee (Markman Order)	402; 403
406	Exhibit 6 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403(including because Planar has indicated that it “may” decide to present less than all of its prior art to the jury, to the extent Planar’s expert does not testify about or otherwise sponsor a particular piece of purported prior art, such documents would not be relevant, and they would be unfairly prejudicial, including in terms of Mass being ambushed during trial with the prior art that Planar actually intends to rely upon, and in terms of being confusing and/or misleading to the jury.)
407	Exhibit 7 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
408	Exhibit 8 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
409	Exhibit 9 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)

Exhibit Number	Exhibit Description	Mass's Objections
410	Exhibit 10 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
411	Exhibit 11 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
412	Exhibit 12 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
413	Exhibit 13 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
414	Exhibit 14 to January 1, 2017 Report of Dr. Raymond Yee (invalidity chart from Report)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
415	Exhibit 15 to January 1, 2017 Report of Dr. Raymond Yee (103 published application)	802; 901; 402; 403 (<i>see</i> above re Ex. 406)
416	Exhibit 16 to January 1, 2017 Report of Dr. Raymond Yee (103 patent)	901; 402; 403 (<i>see</i> above re Ex. 406)
417	Exhibit 17 to January 1, 2017 Report of Dr. Raymond Yee (PCT app for 103 patent)	901; 402; 403 (<i>see</i> above re Ex. 406)
418	Exhibit 18 to January 1, 2017 Report of Dr. Raymond Yee (Leveridge 328)	901; 402; 403 (<i>see</i> above re Ex. 406)
419	Exhibit 19 to January 1, 2017 Report of Dr. Raymond Yee (Moscovitch 939)	402; 403 (<i>see</i> above re Ex. 406)
420	Exhibit 20 to January 1, 2017 Report of Dr. Raymond Yee (Erogotron catalog)	402; 403 (<i>see</i> above re Ex. 406)
421	Exhibit 21 to January 1, 2017 Report of Dr. Raymond Yee (TW 215)	901; 402; 403 (<i>see</i> above re Ex. 406)
422	Exhibit 22 to January 1, 2017 Report of Dr. Raymond Yee (Moore 457)	901; 402; 403 (<i>see</i> above re Ex. 406)
423	Exhibit 23 to January 1, 2017 Report of Dr. Raymond Yee (Case 566)	901; 402; 403 (<i>see</i> above re Ex. 406)

Exhibit Number	Exhibit Description	Mass's Objections
424	Exhibit 24 to January 1, 2017 Report of Dr. Raymond Yee (Manas 381)	901; 402; 403 (see above re Ex. 406)
425	Exhibit 25 to January 1, 2017 Report of Dr. Raymond Yee (Yu 258)	901; 402; 403 (see above re Ex. 406)
426	Exhibit 26 to January 1, 2017 Report of Dr. Raymond Yee (Ohishi 153)	901; 402; 403 (see above re Ex. 406)
427	Exhibit 27 to January 1, 2017 Report of Dr. Raymond Yee (Jingu 127)	901; 402; 403 (see above re Ex. 406)
428	Exhibit 28 to January 1, 2017 Report of Dr. Raymond Yee (742 provisional)	901; 402; 403 (see above re Ex. 406)
429	Exhibit 29 to January 1, 2017 Report of Dr. Raymond Yee (Maher 337)	901; 402; 403 (see above re Ex. 406)
430	Exhibit 30 to January 1, 2017 Report of Dr. Raymond Yee (Translation of TW 215)	901; 802; 402; 403 (see above re Ex. 406)
431	Exhibit 31 to January 1, 2017 Report of Dr. Raymond Yee (Weider 492)	901; 402; 403 (see above re Ex. 406)
432	Exhibit 32 to January 1, 2017 Report of Dr. Raymond Yee (Barchus 663)	901; 402; 403 (see above re Ex. 406)
433	Exhibit 33 to January 1, 2017 Report of Dr. Raymond Yee (Rutstrom 279)	901; 402; 403 (see above re Ex. 406)
434	Exhibit 34 to January 1, 2017 Report of Dr. Raymond Yee (Niemann 424)	901; 402; 403 (see above re Ex. 406)
435	Exhibit 35 to January 1, 2017 Report of Dr. Raymond Yee (Carnevali 885)	901; 402; 403 (see above re Ex. 406)
436	Exhibit 36 to January 1, 2017 Report of Dr. Raymond Yee (Kasper 638)	901; 402; 403 (see above re Ex. 4060)
437	Exhibit 37 to January 1, 2017 Report of Dr. Raymond Yee (Pederson 104)	901; 402; 403 (see above re Ex. 406)

Exhibit Number	Exhibit Description	Mass's Objections
438	Exhibit 38 to January 1, 2017 Report of Dr. Raymond Yee (Brandenberg 334)	901; 402; 403 (see above re Ex. 406)
439	Exhibit 39 to January 1, 2017 Report of Dr. Raymond Yee (JP 295)	901; 802; 402; 403 (see above re Ex. 406)
440	Exhibit 40 to January 1, 2017 Report of Dr. Raymond Yee (Hardman 297)	901; 402; 403 (see above re Ex. 406)
441	Exhibit 41 to January 1, 2017 Report of Dr. Raymond Yee (Carfo 790)	901; 402; 403 (see above re Ex. 406)
442	Exhibit 42 to January 1, 2017 Report of Dr. Raymond Yee (Anderson 784)	901; 402; 403 (see above re Ex. 406)
443	Exhibit 43 to January 1, 2017 Report of Dr. Raymond Yee (King 539)	901; 402; 403 (see above re Ex. 406)
444	Exhibit 44 to January 1, 2017 Report of Dr. Raymond Yee (Sharp radios over the years)	901; 802; 402; 403 (see above re Ex. 406)
445	Exhibit 45 to January 1, 2017 Report of Dr. Raymond Yee (Popular Science Nov. 1994)	901; 802; 402; 403 (see above re Ex. 406)
446	Exhibit 46 to January 1, 2017 Report of Dr. Raymond Yee (PC Magazine Nov. 1995)	901; 802; 402; 403 (see above re Ex. 406)
447	Exhibit 47 to January 1, 2017 Report of Dr. Raymond Yee (Reexam FH)	901; 402; 403
448	Exhibit 48 to January 1, 2017 Report of Dr. Raymond Yee (Reexam FH)	901; 402; 403
449	Exhibit 49 to January 1, 2017 Report of Dr. Raymond Yee (Amendment Remarks from Reexam)	901; 402; 403
450	Exhibit 50 to January 1, 2017 Report of Dr. Raymond Yee (Mayer Provisional)	901; 402; 403; 702 (no expert analysis)
451	Exhibit 51 to January 1, 2017 Report of Dr. Raymond Yee (331 FH)	None (duplicative of JX 3)

Exhibit Number	Exhibit Description	Mass's Objections
452	Exhibit 52 to January 1, 2017 Report of Dr. Raymond Yee (English trans of JP 295)	901; 802; 402; 403 (see above re Ex. 406)
453	Exhibit 53 to January 1, 2017 Report of Dr. Raymond Yee (Ergotron)	402; 403 (see above re Ex. 406)
454	Exhibit 54 to January 1, 2017 Report of Dr. Raymond Yee (Ergotron)	402; 403 (see above re Ex. 406)
455	Exhibit 55 to January 1, 2017 Report of Dr. Raymond Yee (Ergotron)	402; 403 (see above re Ex. 406)
456	Exhibit 56 to January 1, 2017 Report of Dr. Raymond Yee (Ergotron)	402; 403 (see above re Ex. 406)
457	Exhibit 57 to January 1, 2017 Report of Dr. Raymond Yee (Ergotron)	402; 403 (see above re Ex. 406)
458	Exhibit 58 to January 1, 2017 Report of Dr. Raymond Yee (Sweere 687)	901; 402; 403 (see above re Ex. 406)
459	Exhibit 59 to January 1, 2017 Report of Dr. Raymond Yee (Sweere 478)	901; 402; 403 (see above re Ex. 406)
460	Exhibit 60 to January 1, 2017 Report of Dr. Raymond Yee (Sweere 316)	901; 402; 403 (see above re Ex. 406)
461	Image at paragraph 57 of January 1, 2017 Report of Dr. Raymond Yee (bank pin and rear view mirror)	901; 402; 403 (see above re Ex. 406)
462	Tab 1 to January 27, 2017 Report of Brett Reed (CV)	802 and cumulative of testimony needed to qualify the witness as expert
463	Tab 2 to January 27, 2017 Report of Brett Reed (docs considered)	802 and cumulative of expected testimony
464	Tab 3 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
465	Tab 4 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart

Exhibit Number	Exhibit Description	Mass's Objections
466	Tab 5 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
467	Tab 6 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
468	Tab 7 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
469	Tab 8 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
470	Tab 9 to January 27, 2017 Report of Brett Reed (spreadsheet with calcs)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
471	Tab 10 to January 27, 2017 Report of Brett Reed (TW exchange rates)	901 and pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
472	Tab 11 to January 27, 2017 Report of Brett Reed (Reddit)	901; 802; 402; 403
473	Tab 12 to January 27, 2017 Report of Brett Reed (Chief and Planar packaging)	802; 402; 403
474	Tab 13 to January 27, 2017 Report of Brett Reed	901; 802
475	Tab R1 to January 27, 2017 Report of Brett Reed (summary of Fellowes payments)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
476	Tab R2 to January 27, 2017 Report of Brett Reed (summary of Milestone/chief payments)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
477	Tab R3 to January 27, 2017 Report of Brett Reed (summary of Modernsolids payments)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart

Exhibit Number	Exhibit Description	Mass's Objections
478	Tab R4 to January 27, 2017 Report of Brett Reed (summary of Rightangle payments)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
479	Tab R5 to January 27, 2017 Report of Brett Reed (summary of Steelcase)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
480	Tab R6 to January 27, 2017 Report of Brett Reed (summary of K&V/Waterloo)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
481	Tab R7 to January 27, 2017 Report of Brett Reed (summary of Workrite)	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
482	Table 1 from January 27, 2017 Report of Brett Reed (331 redesign costs)	702; 802; 402; 403
483	Table 2 from January 27, 2017 Report of Brett Reed (978 redesign costs)	702; 802; 402; 403
484	Table 3 from January 27, 2017 Report of Brett Reed (summary of reasonable royalty rates and damages)	702; 802; 402; 403
485	Table 4 from January 27, 2017 Report of Brett Reed (summary of reasonable royalty rates and damages)	702; 802; 402; 403
486	Figure 2 from January 27, 2017 Report of Brett Reed	Pursuant to FRE 1006, Mass requests identification of and access to the purported voluminous writings that are summarized in this chart
487	Exhibit 1 to January 27, 2017 Report of Dr. Raymond Yee (CV)	802 and cumulative of testimony needed to qualify the witness as expert
488	Exhibit 2 to January 27, 2017 Report of Dr. Raymond Yee (materials considered)	802 and cumulative of expected testimony
489	Exhibit 3 to January 27, 2017 Report of Dr. Raymond Yee (978 patent)	None (but duplicate)

Exhibit Number	Exhibit Description	Mass's Objections
490	Exhibit 4 to January 27, 2017 Report of Dr. Raymond Yee (331 patent)	None (but duplicate)
491	Exhibit 5 to January 27, 2017 Report of Dr. Raymond Yee (Markman order)	402; 403 (also duplicate)
492	Exhibit 15 to January 27, 2017 Report of Dr. Raymond Yee (Moscovitch 376 publication of 103)	901; 402; 403 (see above re Ex. 406) (also duplicate)
493	Exhibit 16 to January 27, 2017 Report of Dr. Raymond Yee (103 patent)	901; 402; 403 (see above re Ex. 406) (duplicate)
494	Exhibit 17 to January 27, 2017 Report of Dr. Raymond Yee (493 WO publication)	901; 402; 403 (see above re Ex. 406) (duplicate)
495	Exhibit 28 to January 27, 2017 Report of Dr. Raymond Yee (742 provisional)	901; 402; 403 (duplicate)
496	Exhibit 47 to January 27, 2017 Report of Dr. Raymond Yee (reexam FH)	901; 402; 403 (duplicate)
497	Exhibit 48 to January 27, 2017 Report of Dr. Raymond Yee (reexam FH)	901; 402; 403 (duplicate)
498	Exhibit 49 to January 27, 2017 Report of Dr. Raymond Yee (amendment and remarks)	901; 402; 403 (duplicate)
499	Exhibit 50 to January 27, 2017 Report of Dr. Raymond Yee (Maher provisional)	901; 402; 403 (see above re Ex. 406) (duplicate)
500	Exhibit 51 to January 27, 2017 Report of Dr. Raymond Yee (331 FH)	None
501	Exhibit 331 to January 27, 2017 Report of Dr. Raymond Yee (non-infringement chart for 331)	802; 402; 403
502	Exhibit 978 to January 27, 2017 Report of Dr. Raymond Yee (non-infringement chart for 978)	802; 402; 403
503	Exhibit Experiment to January 27, 2017 Report of Dr. Raymond Yee (pictures from Yee Report)	901; 1002

Exhibit Number	Exhibit Description	Mass's Objections
504	Exhibit Google to January 27, 2017 Report of Dr. Raymond Yee (google images)	901; 802; 402; 403
505	Exhibit K3 to January 27, 2017 Report of Dr. Raymond Yee (installation instructions from Chief)	901; 802; 402; 403
506	Exhibit Stands to January 27, 2017 Report of Dr. Raymond Yee	901; 402; 403
507	Photo at paragraph 42 of January 27, 2017 Report of Dr. Raymond Yee	None
508	Physical Exhibit: disassembled joint shown in previous exhibit	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
509	Images at paragraph 82 of January 27, 2017 Report of Dr. Raymond Yee	901; 802
510	PLANAR003713	901; 802; 402; 403
511	Translation of previous exhibit	901; 802. Further, it does not appear that the document for which this is purportedly a "placeholder" was produced during discovery and Mass objects on that basis. Mass reserves additional objections for such time as the exhibit is actually provided to Mass.
512	PLANAR003714	901; 802; 402; 403
513	Translation of previous exhibit	901; 802. Further, it does not appear that the document for which this is purportedly a "placeholder" was produced during discovery and Mass objects on that basis. Mass reserves additional objections for such time as the exhibit is actually provided to Mass.
514	PLANAR003715	901; 802; 402; 403
515	Translation of previous exhibit	901; 802. Further, it does not appear that the document for which this is purportedly a "placeholder" was

Exhibit Number	Exhibit Description	Mass's Objections
		produced during discovery and Mass objects on that basis. Mass reserves additional objections for such time as the exhibit is actually provided to Mass.
516	PLANAR003716	901; 802; 402; 403
517	Translation of previous exhibit	901; 802. Further, it does not appear that the document for which this is purportedly a "placeholder" was produced during discovery and Mass objects on that basis. Mass reserves additional objections for such time as the exhibit is actually provided to Mass.
518	Chief Manufacturing Video referenced at paragraph 103 of January 27, 2017 Report of Dr. Raymond Yee	901; 802; 402; 403. Further, it does not appear that this purported video was produced during discovery and Mass objects on that basis.
519	PLANAR003769-70	None
520	Physical Exhibit: first stand shown at paragraph 134 of January 27, 2017 Report of Dr. Raymond Yee	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
521	Physical Exhibit: second stand shown at paragraph 134 of January 27, 2017 Report of Dr. Raymond Yee	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass. Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
522	Physical Exhibit: third stand shown at paragraph 134 of January 27, 2017 Report of Dr. Raymond Yee	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.

Exhibit Number	Exhibit Description	Mass's Objections
523	Physical Exhibit: fourth stand shown at paragraph 134 of January 27, 2017 Report of Dr. Raymond Yee	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
524	Exhibit 102 from Moscovitch and Waraksa depositions (labeled M140033- M140218)	None (but duplicative)
525	Exhibit 132 from Waraksa deposition (U.S. Pat. No. 5,687,939)	None (but duplicative)
526	Physical Exhibit: Dual Monitor Stand and box	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
527	Physical Exhibit: Dual Monitor Stand manual	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
528	Physical Exhibit: Triple Monitor Stand and box	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
529	Physical Exhibit: Triple Monitor Stand manual	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
530	Physical Exhibit: Quad Monitor Stand and box	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
531	Physical Exhibit: Quad Monitor Stand manual	Mass has not seen this physical exhibit and will need to review it for

Exhibit Number	Exhibit Description	Mass's Objections
		completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
532	Physical Exhibit: Large Format Dual Monitor Stand and box	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
533	Physical Exhibit: Large Format Dual Monitor Stand manual	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.
534	Physical Exhibit: Ergotron monitor stand	901; 402; 403. Further, it does not appear that this purported video was produced during discovery and Mass objects on that basis.
535	PLANAR000013- PLANAR000020 (Planar drawings)	None
536	PLANAR000026- PLANAR000028 (Planar drawings)	None
537	PLANAR000763- PLANAR000774 (Planar drawings)	402; 403; 701 (would involve improper lay testimony); 702 (no expert analysis);
538	PLANAR003794 (Attestation for (translation of JP 357)	901; 802; 402; 403
539	PLANAR003795- PLANAR003799 (translation of JP 357)	901; 802; 402; 403
540	PLANAR003800- PLANAR003807 (Highgrade design patent)	901; 702; 402; 403
541	PLANAR003745- PLANAR003748 (TW 215)	901; 402; 403 (see above re Ex. 406)
542	PLANAR003749- PLANAR003750 (TW 215 trans)	901; 802; 402; 403 (see above re Ex. 406)
543	PLANAR003751- PLANAR003756 (JP)	901; 802; 402; 403 (see above re Ex. 406) (and duplicate of 439)

Exhibit Number	Exhibit Description	Mass's Objections
544	PLANAR003757 (trans statement)	901; 802; 402; 403 (see above re Ex. 406)
545	PLANAR003758-PLANAR003766 (transl of JP 295)	901; 802; 402; 403 (see above re Ex. 406) (and duplicate of 452)
546	PLANAR003773-PLANAR003780 (pictures of stands with Chinese writing)	901; 402; 403
547	Exhibit 1 to April 4, 2017 Report of Frank Bernstein (CV)	802 and cumulative of testimony needed to qualify the witness as expert
548	Exhibit 2 to April 4, 2017 Report of Frank Bernstein (materials considered)	802 and cumulative of expected testimony
549	PLANAR003712 (estimated commissions)	901; 802; 402; 403
550	Patent 5,687,939	None (and duplicative)
551	2017-04-19 (106-3) Planar Exhibit 3 - Original Complaint.pdf (9X Complaint)	None
552	2017-04-19 (106-4) Planar Exhibit 4 - Notice of Compliance.pdf	402; 403; Planar improperly attempting to contradict Rule 30(b)(6) testimony on willfulness
553	2017-04-19 (106-6) Planar Exhibit 6 - Stipulation of Dismissal.pdf	None
554	2017-05-19 (153-1) Exhibit 15.pdf	901; 1002
555	2017-05-19 (153-2) Exhibit 16.pdf	901; 1002
556	2017-05-19 (153-3) Exhibit 17.pdf	901; 1002
557	Plaintiff's Supplemental Responses to Defendant's Second Set of Interrogatories, dated December 13, 2016	402; 403
558	manual for Dual Monitor Stand and Quad Monitor Stand products, bearing production numbers PLANAR003769-3770	None
559	Planar's Installation Manual for the Large Format Dual Monitor Stand, which has been identified as production number PLANAR003645	None

Exhibit Number	Exhibit Description	Mass's Objections
560	Planar's Installation Manual for Dual Monitor Stand and Quad Monitor Stand, bearing production numbers PLANAR003648-3649	None
561	Planar's Triple Monitor Stand Installation Manual / Instruction Manual, bearing production numbers PLANAR003767-3768	None
562	photograph of the base plate of one of Planar's Large Format Dual Monitor Stands, with one arm laid across it to show the relative dimensions of the two components, bearing production number PLANAR000692	901; 402; 403; 1002
563	photograph of several components of Planar's Large Format Dual Monitor Stand in the manner in which they are arranged for shipping, labeled with production number PLANAR000690	901; 1002
564	prosecution file history of U.S. Patent Application Serial No. 08/638,158, bearing production numbers M140220 – M140302, indicating that it was produced by Mass Engineered Design, Inc. (939 FH)	None
565	prosecution file history of U.S. Reissue Patent Application Serial No. 09/172,193, bearing production numbers M140033 – M140218, indicating that it was produced by Mass Engineered Design, Inc.	901; 402; 403
566	excerpts from the file history of U.S. Pat. App. Serial No. 10/129,884, which led to the issuance of U.S. Patent No. 8,102,331.	901; 402; 403
567	Declaration of Jerry Moscovitch in Support of Plaintiff's Opening	402; 403

Exhibit Number	Exhibit Description	Mass's Objections
	Claim Construction Brief, dated March 2, 2015, and filed March 11, 2015 as ECF No. 74-2 in this case	
568	transcript of the deposition of Mr. Jerry Moscovitch, taken in this case on December 14, 2016	802; 402; 403
569	excerpts of Exhibit 122 to the deposition of Mr. Jerry (742FH) Moscovitch, taken in this case on December 14, 2016	106; 901; 402; 403
570	search results of a search that I performed on www.google.com, for the terms "length width height", on April 13, 2017. For the sake of brevity, only the first three pages of search results are reproduced in this exhibit	901; 402; 403; 701; 702
571	search results of a search that I performed on www.google.com, for the terms "length width depth", on April 13, 2017. For the sake of brevity, only the first three pages of search results are reproduced in this exhibit	901; 402; 403; 701; 702
572	Mass's Responses to Planar's First Set of Requests for Admission, dated Dec. 21, 2016	402; 403. Further, denials of RFAs are not admissible.
TBD	Impeachment Exhibits	Mass has not seen this physical exhibit and will need to review it for completeness and accuracy for the time of trial. Mass reserves its objections for such time as the exhibit is actually provided to Mass.

Dated this August 1, 2017

/s/ Stephen F. Schlather

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Attorneys for Plaintiff

Mass Engineered Design, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2017 I filed the foregoing with the Clerk of Court via the CM/ECF system, which will provide service to all attorneys of record.

/s/ Stephen F. Schlather

Stephen F. Schlather